

1
2
3
4
5
6
7
8
9
10 **IN THE UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 ULTRAMAX PRODUCTS LTD., a
13 United Kingdom Limited Company.

14 Plaintiff,

15 vs.
16

17 ANTHONY MICHAEL MITCHELL,
18 An individual residing in Nevada
19 Defendant.

Case No.: 2:18-cv-1862-RCJ-DJA

**ORDER GRANTING JOINT
STIPULATION TO STAY ALL
DEADLINES AND TELEPHONIC
STATUS CONFERENCE**

[FIRST REQUEST]

20 Plaintiff ULTRAMAX PRODUCTS LTD. (“Ultramax” or “Plaintiff”) and
21 Defendant ANTHONY MICHAEL MITCHELL (“Mitchell” or “Defendant”) submit
22 this Joint Stipulation to stay all deadlines. The parties do hereby stipulate to stay the
23 case for sixty (60) days while the parties finalize a settlement agreement. The parties
24 have already agreed to the 9 major terms that will be in a final agreement and need
25 time to finalize the final long form agreement

26 This is the first such request by either party to extend or modify the schedule.
27 Good cause exists because all matters in controversy between the Parties have been
28 settled through a binding list of terms to be included into a final long form written

1 agreement. The parties have been and are engaged in good faith discussions but
2 need additional time to finalize the settlement agreement and file dismissal
3 papers. The parties have circulated and agreed to a list of terms. The parties believe
4 that entry of a temporary stay will promote judicial economy and preserve the
5 Court's resources. Accordingly, the parties respectfully request a 60-day stay for
6 the above-referenced action including all discovery deadlines and any claim
7 construction deadlines to permit the parties time to finalize the agreement and
8 dismiss all pending actions in this Court.

9 Wherefore, the Parties respectfully request that the Court enter an order
10 staying all deadlines in this matter for sixty (60) days so that the Parties can finalize
11 their settlement agreement and dismiss this case.

12 I, Nihat Deniz Bayramoglu, attest th at the other signatory or their agent on
13 this Joint Stipulation concurs in the filing's content and has authorized the filing.
14

15 DATED: June 15, 2022

Respectfully submitted,
BAYRAMOGLU LAW OFFICES LLC
by: /s/ Nihat Deniz Bayramoglu
NIHAT DENIZ BAYRAMOGLU
Nihat Deniz Bayramoglu (State Bar No. 294922)
deniz@bayramoglu-legal.com
1540 West Warm Springs Road, Suite 100
Henderson, NV 89014
Telephone: (702) 462-5973
Facsimile: (702) 553-3404
Attorneys for Plaintiff Ultramax Products Ltd

1 DATED: June 15, 2022

Respectfully submitted,

2 ANTHONY MICHAEL MITCHELL

3 By: /s/ Anthony Michael

4 MITCHELL ANTHONY MICHAEL

MITCHELLAnthony@dimpleclip.co

m

5 c/o Liz Gabriela Gonzalez Lopez

6 Notaria 83 Av Chemuyil 1345

7 Galaxia del Carmen

77710, Playa del Carmen, Mexico

8 Defendant, Pro Se

9
10
11 ORDER

12
13 IT IS HEREBY ORDERED that the Joint Stipulation to Stay All Deadlines (ECF No. 44)
14 is GRANTED.

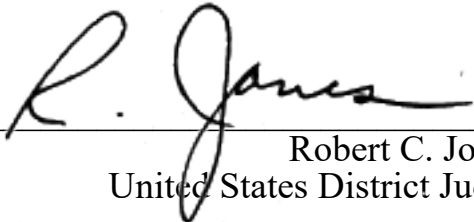
15 IT IS FURTHER ORDERED that this case is stayed for sixty (60) days or until Monday,
16 August 22, 2022.

17 IT IS FURTHER ORDERED that the parties shall file a Joint Status Report on or before
18 5:00 P.M., Wednesday, August 17, 2022.

19 IT IS FURTHER ORDERED that a Telephonic Status Conference is set for 10:00 A.M.,
20 Monday, August 22, 2022, in Reno Courtroom 3, before District Judge Robert C. Jones.

21 IT IS FURTHER ORDERED that counsel shall dial into the AT&T Meet-Me-Line
22 888-675-2535 and provide Access Code No.: 2900398 and Security Code: 082222 five
23 minutes prior to the hearing. Please remain on the line until such time as the Court
24 joins the call and convenes the proceeding.

25 IT IS SO ORDERED
26 Dated: June 21st 2022

27
28

Robert C. Jones
United States District Judge